

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

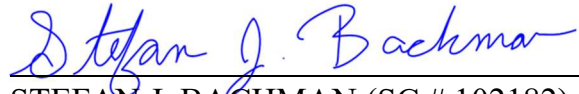
UNITED STATES OF AMERICA)	
)	
Plaintiff,)	Civil Action No. 1:21-cv-00040-CCE-JEP
)	
v.)	
)	
PILKINGTON NORTH AMERICA,)	
INC.)	
)	
Defendant.)	

UNOPPOSED MOTION TO ENTER CONSENT DECREE (ECF NO. 2-1)

The United States respectfully moves the Court to enter, as a final judgment in this matter, the Consent Decree lodged at ECF No. 2-1 on January 14, 2021, by signing the Decree on page 75. Entry of the Consent Decree will resolve the United States' claims against Pilkington North America, Inc. for violations of the Clean Air Act at its glass manufacturing facility in Laurinburg, North Carolina. (*See* ECF No. 1). This motion is unopposed. Pilkington has specifically agreed not to oppose entry by the Court, and it has consented to entry without further notice. (ECF No. 2-1 at 79, ¶ 112). As set forth in the attached brief, the Court should grant the United States' motion because the Consent Decree is fair, adequate, reasonable, and consistent with the public interest.

Respectfully submitted,

JEAN E. WILLIAMS
Acting Assistant Attorney General
Environment and Natural Resources Division
U.S. Department of Justice



STEFAN J. BACHMAN (SC # 102182)
Trial Attorney
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, DC 20044
Telephone: (202) 616-6536
Facsimile: (202) 514-0097
Email: stefan.bachman@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a true copy of this document and all attachments has been served today by email to Pilkington North America, Inc.'s counsel as follows:

Mack McGuffey
Troutman, Pepper, Hamilton, Sanders LLP
600 Peachtree Street, NE, Suite 3000, Atlanta, GA 30308
mack.mcguffey@troutman.com



STEFAN J. BACHMAN